

EXHIBIT D

(Public – Redacted)

From: Sal Cataldo [REDACTED]
Sent: Thursday, February 24, 2022 11:06 AM
To: James Lee
Subject: FW: Google Tracking Lawsuit
Attachments: ~WRD0005.jpg

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From: Sal Cataldo [REDACTED]
Sent: Tuesday, July 28, 2020 4:16 PM
To: Mark Mac [REDACTED]
Cc: Ethan Dunn [REDACTED]
Subject: Re: Google Tracking Lawsuit

Sorry for the delayed response here. Been a very crazy week at home and work.

I'm honestly not sure how long I've had it shut off. I know that there's definitely been a few times where I've shut it off, and then it seems to turn back on.

Specifically, here's how I used to see this go:

I would have it turned off on my chrome on my main computer.

I would get a new device (I'm generally an android guy).

All of a sudden I'd see search history from one device wind up on another, and be confused on how its happening.

Then I'd see the new device was set to sync all devices, INCLUDING settings, so that whatever "default" settings were on the new device would then sync across my google linked devices, which would then override the devices where I had sync turned off, and they would all sync together.

When you first made the post I saw that Delete Psat Activity was still turned off in my privacy, but web & app activity was turned on, even though I thought it had been turned off for years.

I don't keep track of it all that much to know exactly when I turned it off but I know I've never gone back in and turned it on.

And I don't remember when I turned on the delete activity but at least a couple years I want to say.

Very Truly Yours,

Sal J. Cataldo, Esq.
O'Doherty & Cataldo

[REDACTED] [REDACTED]

[REDACTED]
[REDACTED]
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From: Ethan Dunn [REDACTED]
Sent: Tuesday, July 28, 2020 12:54 PM
To: Sal Cataldo [REDACTED] Mark Mao [REDACTED]
Subject: Re: Google Tracking Lawsuit

Hi Sal,

Connecting you with Mark Mao, the lead attorney on the google suit. He'll follow up with you to discuss further!

Thanks,
Ethan

On Fri, Jul 24, 2020 at 4:00 PM Ethan Dunn [REDACTED] wrote:

Hi Sal,

Just following up here. Have you had the "Web & App Activity" on your google account shut off for quite some time? Or, how long have you had it off?

Let me know. I'll put you in touch with the attorney working on this suit when I hear from you.

Thanks,
Ethan

On Tue, Jul 21, 2020 at 11:11 AM Ethan Dunn [REDACTED] wrote:

Hi Sal,

Thanks for reaching out. Quick question:

How long have you had the "Web & App Activity" setting turned off?

Thanks,
Ethan

On Wed, Jul 15, 2020 at 9:06 PM Sal Cataldo [REDACTED] wrote:

Hey Ethan,

I saw Ericka's post in the slack about looking for someone who fits the profile of having an android, having a google account, and turning privacy settings to Off/Delete Past Activity, which I've definitely done.

Not sure what other info you need or what you are looking to find out but happy to help any way I can.

Thanks!

Sal

Very Truly Yours,

Sal J. Cataldo, Esq.

O'Doherty & Cataldo

[REDACTED] [REDACTED]
[REDACTED] [REDACTED]

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